

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
-----X		

**STIPULATION BY AND BETWEEN THE CITY OF DETROIT,
MICHIGAN AND JEROME COLLINS FOR THE ENTRY OF AN ORDER
EXTENDING THE TIME FOR JEROME COLLINS TO FILE A
RESPONSE TO THE CITY OF DETROIT’S CORRECTED MOTION FOR
THE ENTRY OF AN ORDER (I) ENFORCING THE PLAN OF
ADJUSTMENT INJUNCTION AND (II) REQUIRING THE DISMISSAL
WITH PREJUDICE OF THE FEDERAL COURT ACTION FILED BY
JEROME COLLINS TO THE EXTENT IT SEEKS RELIEF AGAINST THE
CITY OF DETROIT OR PROPERTY OF THE CITY OF DETROIT**

The City of Detroit, Michigan (“City”) and Jerome Collins (“Collins”) file this Stipulation by and between the City of Detroit, Michigan and Jerome Collins for the Entry of an Order Extending the Time for Jerome Collins to File a Response to the City of Detroit’s Corrected Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (I) Requiring the Dismissal With Prejudice of the Federal Court Action Filed by Jerome Collins to the Extent It Seeks Relief Against the City of Detroit or Property of the City of Detroit (“Stipulation”).

1. On July 8, 2015, the City filed its Corrected Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (I) Requiring the Dismissal With Prejudice of the Federal Court Action Filed by Jerome Collins to the Extent It Seeks Relief Against the City of Detroit or Property of the City of Detroit [Doc. No. 10182] (“Motion”).

2. On September 23, 2015, the City filed the Suggestion of Bankruptcy as to Jerome Collins, staying prosecution of the Motion. [Doc. No. 10197].

3. On or about December 28, 2015, the United States Bankruptcy Court for the Eastern District of Michigan entered a final decree in Mr. Collins’ individual bankruptcy case, case number 15-53613.

4. On April 21, 2016, the City filed and served a notice of opportunity to respond to the Motion. [Doc. No. 11103].

5. The City and Collins have been engaged in discussions regarding a potential settlement of the Motion.

6. The City and Collins request that the Court enter an order extending the deadline for Collins to file a response to the Motion to July 29, 2016.

WHEREFORE, the City and Collins respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit A.

STIPULATED AND AGREED:

ATTORNEYS FOR THE CITY	ATTORNEYS FOR JEROME COLLINS
By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) Ronald A. Spinner (P73198) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 swansonm@millercanfield.com spinner@millercanfield.com	By: <u>/s/ Benjamin Whitfield, Jr.</u> Benjamin Whitfield, Jr., Esq. (P23562) Cynthia J. Gaither, Esq. (P40755) BENJAMIN WHITFIELD, JR. & ASSOCIATES, P.C. 547 East Jefferson Ave Detroit, Michigan 48226 Telephone: (313) 961-1000 Facsimile: (313) 961-3110 benwlaw123@aol.com benwlaw4822@aol.com

DATED: July 19, 2016

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	X	
	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker

**ORDER GRANTING STIPULATION BY AND BETWEEN THE CITY OF
DETROIT, MICHIGAN AND JEROME COLLINS FOR THE ENTRY OF
AN ORDER EXTENDING THE TIME FOR JEROME COLLINS TO FILE
A RESPONSE TO THE CITY OF DETROIT’S CORRECTED MOTION
FOR THE ENTRY OF AN ORDER (I) ENFORCING THE PLAN OF
ADJUSTMENT INJUNCTION AND (II) REQUIRING THE DISMISSAL
WITH PREJUDICE OF THE FEDERAL COURT ACTION FILED BY
JEROME COLLINS TO THE EXTENT IT SEEKS RELIEF AGAINST THE
CITY OF DETROIT OR PROPERTY OF THE CITY OF DETROIT**

Upon the Stipulation by and Between the City of Detroit, Michigan and
Jerome Collins for the Entry of an Order Extending the Time for Jerome Collins to
File a Response to the City of Detroit’s Corrected Motion for the Entry of an Order
(I) Enforcing the Plan of Adjustment Injunction and (I) Requiring the Dismissal
With Prejudice of the Federal Court Action Filed by Jerome Collins to the Extent It
Seeks Relief Against the City of Detroit or Property of the City of Detroit
 (“Stipulation”);¹ and the Court being otherwise advised in the premises;

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation

IT IS ORDERED THAT Jerome Collins must file a response to the Motion
no later than July 29, 2016.